



I/1  
1/20/06

January 20, 2006

US EPA RECORDS CENTER REGION 5



Mr. Michael Ribordy  
On-Scene Coordinator  
United States Environmental Protection Agency  
Region 5  
77 W. Jackson Street, SE-5J  
Chicago, Illinois 60604

**RE: Next Media Operating, Inc. - Update  
114 Tower Hill Road  
Gilberts, Illinois**

URS Corporation (URS) respectfully submits the following update regarding the ongoing remediation of lead-impacted soils at 114 Tower Hill Road (the Site) located in Gilberts, Illinois. URS performed the scope of work described below in accordance with the work plan (WP) approved by the United States Environmental Protection Agency (USEPA), dated December 2004, and subsequent WP amendment, dated October 6, 2005. For your convenience, URS has included photographs taken during field activities and a sample location map, which are referenced below.

## **BACKGROUND**

As requested by USEPA, URS has provided periodic updates regarding the status of remediation at the Site. In addition to the aforementioned WP amendment, URS' previous update letters were dated July 13, 2005 and July 19, 2005. These letters documented the completion of Site Preparation activities, Phase I - North and West Walls (with the exception of backfilling), and Phase IV - Wetland Area (with the exception of the WP Amendment) as described in the USEPA-approved WP. The majority of URS' subsequent updates have been submitted to USEPA via email. This written update has been prepared in accordance with USEPA's request on December 27, 2005, and serves to document the results of URS' remediation activities following the July 2005 updates and subsequent email updates discussed above.

Please note that the phases of the USEPA-approved WP and individual tasks comprising each phase were not necessarily completed in chronological order. This is attributed to contractor availability, utility clearances, logistical issues, results of confirmatory sampling, and a significant increase in project scope due to additional lead-impacted soils encountered southwest of the Village of Gilberts (Village) Public Works garage (garage). As such, this update will discuss the tasks performed and results obtained during each Phase of the WP completed after July 2005.

**PHASE I – North and West Walls**

Following USEPA's review and approval of the data submitted in URS' July 19, 2005, update letter, URS began backfilling activities within the initial excavation area addressed in the USEPA-approved WP. URS' contractor, R.W. Collins Co. (RWC), previously removed approximately 960 tons of lead-impacted material along the north and west walls of the existing excavation area. The material was treated by Severson Environmental Services, Inc. (Severson), in accordance with the USEPA-approved WP, prior to removal from the Site.

On July 27, 2005, RWC commenced backfilling activities. In addition, USEPA conducted a site visit on this date to observe URS' progress toward completion of the USEPA-approved WP. The majority of USEPA's inspection focused upon the area located southwest of the Village garage discussed under Phase V below. Backfilling of the north and west walls, and the majority of the initial excavation, was completed on July 29, 2005, utilizing a total of 82 loads of stone backfill. It should be noted that RWC did not backfill the southeast portion of the excavation, which was later used as the treatment area for the east and south wall material as discussed below.

**PHASE II - East Wall**

Treatment of the east wall of the initial excavation took place on October 21, 2005. As stated in the USEPA-approved WP, battery casings and lead-impacted soils were excavated to the eastern property boundary and treated prior to off-site disposal at the Orchard Hills Landfill in Davis Junction, Illinois (Orchard Hills). This area comprised approximately 100 cubic yards of material. These materials were removed from the Site in conjunction with treated material from the south wall and the floor of the treatment area, which totaled approximately 240 tons as discussed below.

---

The execution of this phase of the WP was delayed significantly due to the presence of a utility pole located along the eastern property boundary. Please note that during the east wall excavation and treatment activities described above, the material surrounding this utility pole was left in place until the local utility could be contacted for assistance. URS' understanding was that ComEd was the utility company responsible for maintaining this equipment. RWC initially contacted ComEd to request assistance with the utility pole in July 2005. RWC and URS made several additional attempts since that date and received no response from ComEd. Representatives from the Village also assisted with no response from ComEd.

URS ultimately reached ComEd in late October 2005, and on November 17, 2005, ComEd mobilized to the Site. Com Ed utilized a lift truck to stabilize the utility pole, in addition to two utility poles located along on the eastern property boundary adjacent to the southwest area discussed below. The remainder of the battery casings and impacted soils were removed up to the eastern property boundary, and treated along with material from the southwest area described below.

Following these activities, URS collected a total of six soil samples along the east property boundary in accordance with the USEPA-approved WP. The purpose was to establish a baseline of subsurface conditions at the property boundary. The samples were submitted to STAT Analysis Corporation (STAT) of Chicago, Illinois, a USEPA-approved laboratory. Of these samples, four exceeded the USEPA-approved remediation objective (RO) of 400 mg/kg for lead. These samples were EW-2 (680 mg/kg), EW-3 (3,700 mg/kg), EW-5 (2,200 mg/kg), and EW-6 (1,800).

### **PHASE III - South Wall**

URS began delineating lead-impacted soils and battery casings along the southern wall of the initial excavation on August 9, 2005. The delineation was performed in conjunction with a test pit investigation of the southwest area as discussed below. Soil samples were screened using a portable X-Ray Fluorescence (XRF) analyzer. These samples were collected after battery casings and other debris were no longer observed in accordance with the USEPA-approved WP. URS completed the south wall delineation on August 11, 2005.

On August 12, 2005, Severson performed treatment of the delineated materials, which occurred either in-situ or within the southeast portion of the initial excavation area as described above. Upon receipt of acceptable Toxicity Characteristic Leaching Procedure (TCLP) results from Severson, RWC removed the treated material for off-site disposal at the Orchard Hills landfill. The excavation was performed on August 29, 2005, and August 30, 2005. Approximately 600 tons of treated material were removed from the Site.

No excavation side walls were present in this area as lead-impacted soils were previously excavated down to the approximate grade of the surrounding area. As such, the delineation and confirmatory samples collected in this area consisted strictly of floor samples.

URS collected a total of eight delineation samples along the southern excavation boundary, which were analyzed by STAT for total lead. Samples exceeding the RO of 400 mg/kg for lead were SW-FS (2,000 mg/kg), SW-1 (620 mg/kg), SW-3 (500 mg/kg), and SW-6DUP (460 mg/kg). It should be noted that the initial soil treatment was conducted based upon XRF screening, and that these laboratory results were not received until after the initial treatment was completed. Additional treatment and/or overexcavation were performed to address these exceedences as described below. URS also collected a total of four confirmatory floor samples (FS-16 through FS-19) on September 8, 2005, following the excavation of treated material. Sample FS-16 was the only sample that exceeded the RO at 550 mg/kg for total lead.

On October 21, 2005, Severson treated additional material along the south wall represented by sample FS-20 and SW-6DUP, in addition to material excavated from the east wall as described above. Severson also treated additional floor material within the

treatment area located in the southeast portion of the initial excavation, and represented by samples FS-3 and FS-4. Upon receipt of acceptable TCLP results from Severson, RWC removed the treated material for off-site disposal at Orchard Hills. The excavation was performed on October 28, 2005 and comprised approximately 240 tons of treated material. Samples FS-3 and FS-4 exceeded the approved RO at 3,400 mg/kg, and FS-20 exceeded at 830 mg/kg. Additional treatment and/or overexcavation were performed to address these exceedences as described below.

During the week of November 14, 2005, Severson performed additional treatment of lead-impacted soils identified by the aforementioned confirmatory floor samples that exceeded the approved RO and were anticipated to exceed the TCLP limit of 5.0 mg/L for lead. Soils represented by these samples were overexcavated by approximately one foot below the confirmatory sample depth and treated along the south excavation boundary. Sample FS-15 was collected as a confirmatory floor sample representing SW-FS and SW-1, and did not exceed the approved RO. Samples FS-3A, FS-4A, and FS-20A were collected as confirmatory floor samples representing FS-3, FS-4, and FS-20, respectively, and did not exceed the approved RO. The remainder of this week consisted of treatment within the southwest area as discussed below. It should be noted that the additional treated soils located along the south wall were stockpiled with treated material from the southwest area, and were removed from the Site during the week of December 19, 2005.

RWC also overexcavated additional untreated south wall material represented by samples FS-16 and SW-3 during the week of December 19, 2005. As stated above, these samples exceeded the approved RO but not to the extent that additional treatment would be required. The untreated soils were overexcavated down one foot below the confirmatory sample depth, and stockpiled and removed from the Site along with treated material from the southwest area discussed below.

---

To date, backfilling has not yet occurred within this area with the exception of the temporary gravel road extending south from the southeast corner of the initial excavation.

#### *Drum Removal*

URS retained the services of SET Environmental, Inc. (SET) to investigate and remove numerous 55-gallon steel drums buried on-site. The USEPA-approved WP noted the presence of one buried drum within the south wall of the existing excavation. SET mobilized to the Site on October 21, 2005. URS identified two additional drums located on the excavation floor near the aforementioned drum, which were not previously observed at the Site. URS identified three additional drums during a test pit investigation within the southwest area described below. Two of these drums were located near the southwest corner of the Village garage, and the third drum was located further south near a utility pole immediately south of the fencing near the Village garage. The latter exhibited a strong paint-like odor at the time of the investigation but did not appear to be leaking any material into the surrounding soil and fill material.

With the exception of the drum exhibiting a paint-like odor, the remaining drums were either empty or contained water or additional battery casings. The drums containing battery casings were treated by Severson and disposed of with additional treated soil and battery casings. The remaining drums were removed by RWC. The drum containing a paint odor and its contents were overpacked in an 80-gallon overpack drum and a sample was collected by SET for laboratory analysis. SET performed an overall waste characterization, and STAT was subcontracted to perform a PCB analysis. SET determined that this drum contained a small quantity of a paint waste containing aromatic hydrocarbons and low levels of polychlorinated biphenyls.

On November 17, 2005, SET returned to the Site, removed the drum and transported it to its own disposal facility in Houston, Texas, as a reportable quantity hazardous waste for ignitability. It is URS' understanding that the waste was scheduled for incineration.

#### **PHASE IV – Wetland Area**

Pursuant to the USEPA-approved WP, URS collected a total of six soil and/or sediment samples in the vicinity of the wetland area on June 16, 2005. Two of the samples (W-1 and W-2) were collected near the boundary of the initial excavation and the adjacent wetland area. The remaining samples (G-1 through G-4) were collected approximately near the northwest and southwest corners of the Village garage.

These samples were submitted to STAT for total lead analysis; however, samples W-1 and W-2 were placed on hold and, to date, have not been analyzed. According to the USEPA-approved WP, these samples were to be collected and analyzed in the event that the south wall delineation samples discussed above did not extent further south into the locations of W-1 and W-2 as proposed in the WP. Because this phase of the WP was performed in advance of the south wall delineation for scheduling reasons, W-1 and W-2 were collected but not analyzed until the south wall delineation was completed. As previously stated, the south wall delineation was completed on August 11, 2005. It was determined that samples W-1 and W-2 were located in the approximately vicinity of the south wall delineation samples SW-3 and SW-5 discussed above.

Samples G-1 and G-2 did not exceed the RO for lead of 400 mg/kg; however, samples G-3 and G-4 located southwest of the Village garage exceeded the RO at 11,000 mg/kg and 19,000 mg/kg, respectively. USEPA indicated to URS that based on these results, USEPA would require that the extent of these lead-impacted soils be investigated, delineated, and addressed in a manner similar to that of the main excavation area. Ultimately, these findings resulted in an amendment to the USEPA-approved WP and additional remediation activities as described below.

#### **PHASE V - Southwest Area**

On August 9, 2005, URS conducted a test pit investigation within the area represented by samples G-3 and G-4. RWC encountered significant battery casing fragments and other

debris throughout an area of approximately 7,700 square feet down to a depth of between two to five feet below ground surface (bgs). These conditions appeared to continue toward the boundary of the adjacent wetland area.

URS collected soil and sediment samples for screening with a portable XRF analyzer. These samples were collected after battery casings or other debris were no longer observed in accordance with the USEPA-approved WP for the main excavation area. The purpose of field screening these samples was to delineate the extent of battery casings and lead-impacted soils within the subject area. URS completed the delineation on August 10, 2005.

URS submitted a total of 10 soil and sediment delineation samples to STAT Analysis Corporation laboratory (STAT), a USEPA-approved laboratory, for total lead analysis. With the exception of sample G-14A, the samples did not exceed the approved remediation objective of 400 mg/kg for lead, indicating that the majority of lead-impacted soils in this area have been delineated. Sample G-14A indicated an elevated lead level of 570 mg/kg. On August 31, 2005, URS informed the Site owner of its findings and provided an approximate cost for remediation and excavation of battery casings and lead-impacted soils.

Upon receipt of authorization to proceed, URS amended the WP on October 4, 2005. The amendment indicated that URS would address this area in a manner consistent with that set forth in the USEPA-approved WP. Treatment within this area was initiated on November 14, 2005 and was completed on November 21, 2005. During treatment activities, URS collected 15 delineation floor samples within this area from depths ranging between 2 to 5 feet bgs. Samples FS-36 and FS-39 revealed elevated lead levels of 450 mg/kg and 490 mg/kg, respectively, whereas the remaining samples did not exceed the RO of 400 mg/kg.

---

URS and RWC ultimately determined that in order to provide truck access for removal of treated material from this area, additional backfilling of the initial excavation and installation of a temporary gravel road between the two areas must first be completed. RWC stockpiled treated material from the eastern portion of the excavation atop that of the western portion, and excavated to the depth of URS' delineation samples as discussed above. This allowed sufficient space in which RWC would install the temporary access road. RWC also overexcavated the area represented by sample FS-36 by approximately one additional foot bgs. As this material did not require treatment based upon the analytical results, RWC stockpiled the material along with the treated material from this area.

On December 5, 2005, RWC initiated backfilling activities and utilized a total of 59 loads, or approximately 1,100 tons, of clean stone to create the access road. The road was completed on December 8, 2005, and removal of treated material was initiated on December 9, 2005 following receipt of acceptable TCLP results. On December 22, 2005, RWC overexcavated the area represented by sample FS-39 by approximately one (1)



additional foot bgs. This material did not require treatment based upon the analytical results, and was removed in conjunction with the remaining treated material from this area. Excavation activities continued through December 23, 2005. As stated above, a portion of the material from the initial excavation area was treated and removed in conjunction with this material. To date, a total of 2,915 tons (171 loads) of treated material have been removed from this area.

#### **PENDING ACTION**

URS estimates that approximately 200 cubic yards of treated material remain at the Site awaiting removal and off-site disposal at Orchard Hills. On January 6, 2006, URS provided the Site owner with cost estimates for site restoration scenarios, and has subsequently received direction regarding the extent to which the Site should be restored. It is URS' intent that upon authorization to proceed, the remaining treated material will be removed prior to and in conjunction with backfilling activities.

If you have any questions regarding the information provided in this update, please do not hesitate to contact either of the undersigned at (312) 939-1000.

Sincerely,

The URS logo is located below the signature of Don R. Smith. It consists of the letters "URS" in a bold, black, sans-serif font.

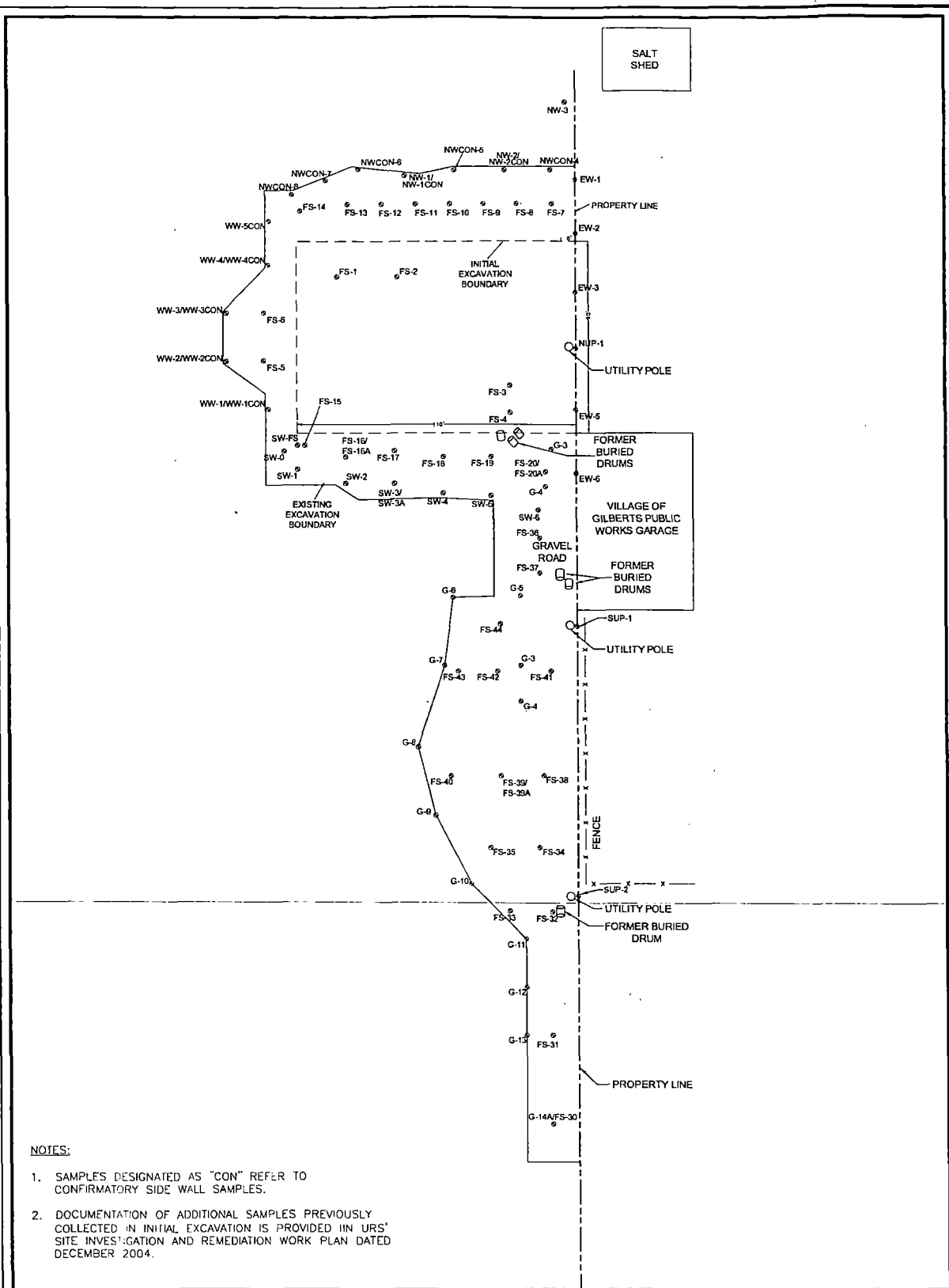
A handwritten signature in black ink, appearing to read "Don R. Smith".

Don R. Smith  
Assistant Project Manager

A handwritten signature in black ink, appearing to read "Chris Albrecht".

Christopher A. Albrecht  
Project Manager

Attachment: Sample Location Map  
Delineation/Confirmatory Sample Results  
Photographic Documentation



**NOTES:**

1. SAMPLES DESIGNATED AS "CON" REFER TO CONFIRMATORY SIDE WALL SAMPLES.
2. DOCUMENTATION OF ADDITIONAL SAMPLES PREVIOUSLY COLLECTED IN INITIAL EXCAVATION IS PROVIDED IN URS' SITE INVESTIGATION AND REMEDIATION WORK PLAN DATED DECEMBER 2004.

**LEGEND**

○ DELINEATION/CONFIRMATORY SAMPLE LOCATIONS



NORTH

0 20 40 80

SCALE IN FEET

NEXT MEDIA OPERATING  
114 TOWER HILL ROAD  
GILBERTS, ILLINOIS

**FIGURE 1**  
**SAMPLE LOCATION MAP**

DATE 1/11/05

FIG NO. 25365101

DRAWN BY MMT

CHECKED BY DS

SCALE 1" = 40'

**URS**

122 S. MICHIGAN AVENUE, SUITE 1920  
CHICAGO, ILLINOIS 60603  
PHONE (312) 929-1000  
FAX (312) 929-1199

# DELINEATION/CONFIRMATORY SAMPLE RESULTS

NEXT MEDIA OPERATING, INC.  
114 TOWER ROAD  
GILBERTS, ILLINOIS

JUNE - DECEMBER 2005

Sample ID/Collection Depth/Date	TACO Tier 1 Residential/Industrial/Commercial Soil Remediation Objective (RO's)	
	Ingestion	Inhalation
	400	—
	SAMPLE RESULTS	
	TOTAL LEAD	Moisture Content (%)
<b>PHASE I - North &amp; West Walls</b>		
NW-1 (4') 6/3/2005	120 J	30.6
NW-1DUP (4') 6/3/2005	110	28.7
NW-1CON (2') 6/3/2005	92	29.5
NW-2 (4') 6/3/2005	940	13.1
NW-2CON (2') 6/3/2005	370	8.52
NW-3 (4') 6/3/2005	350	19.9
NWCON-4 (2') 6/3/2005	23	11
NWCON-5 (2') 7/8/2005	340	23.5
NW-CON6 (2') 7/8/2005	210	29.9
NW-CON-7 (2') 7/8/2005	130	33.1
NW-CON-8 (2') 7/8/2005	230	29.7
NW-CON-8DUP (2') 7/8/2005	230	25.5
WW-1 (1.5') 6/2/2005	64	25.4
WW-1CON (1') 6/2/2005	74	29.1
WW-2 (2.5') 6/2/2005	29	18.8
WW2CON (2') 6/2/2005	21	24.1
WW-3 (3.5') 6/3/2005	39	27.6
WW-3CON (2') 6/3/2005	51	25.9
WW-4 (4') 6/2/2005	100	29.7
WW-4CON (2') 6/2/2005	62	29.4
WW-5CON (2') 7/8/2005	260	35.7
FS-1 (4') 7/8/2005	54	25.3
FS-2 (4') 7/8/2005	65	28.2
FS-5 (4') 7/8/2005	12	35.9
FS-6 (4') 7/8/2005	9.9	36.4
FS-7 (4') 7/8/2005	6.6	23.4
FS-8 (4') 7/8/2005	10	17.5
FS-9 (4') 7/8/2005	26	20.1
FS-10 (4') 7/8/2005	11	19.5
FS-11 (4') 7/8/2005	8	18.7
FS-12 (4') 7/8/2005	13	30.9
FS-13 (4') 7/8/2005	12	22.4
FS-14 (4') 7/8/2005	11	21.9
<b>PHASE II - East Wall</b>		
EW-1 (2') 10/21/2005	39	8.71
EW-2 (2') 10/21/2005	680	20.6
EW-3 (2') 10/21/2005	3,700	25.6
EW-5 (2') 10/21/2005	2,200	15.8
EW-6 (2') 10/21/2005	1,800	15.7
NUP-1 (2') 11/21/2005	240	19.2

# DELINEATION/CONFIRMATORY SAMPLE RESULTS

NEXT MEDIA OPERATING, INC.  
114 TOWER ROAD  
GILBERTS, ILLINOIS

JUNE - DECEMBER 2005

Sample ID/Collection Depth/Date	TACO Tier 1 Residential/Industrial/Commercial Soil Remediation Objective (RO's)	
	Ingestion	Inhalation
	400	—
	SAMPLE RESULTS	
	TOTAL LEAD	Moisture Content (%)
<b>PHASE III - South Wall</b>		
SW-0 (0.5') 8/10/2005	91	54.6
SW-1 (0.5') 8/9/2005	620	19.9
SW-FS (1') 8/9/2005	2,000	34.8
SW-2 (1') 8/11/2005	80	50.8
SW-3 (1') 8/11/2005	500	60.9
SW-4 (1') 8/11/2005	220	53.4
SW-5 (1') 8/11/2005	69	40
SW-6 (1') 8/11/2005	130 J	33.3
SW-6DUP (1') 8/11/2005	460 J	33.8
FS-16 (2.5') 9/8/2005	550	40.2
FS-17 (3') 9/8/2005	140	48
FS-18 (3.5') 9/8/2005	180	46.4
FS-19 (4') 9/8/2005	100	37.7
FS-20 (4') 10/31/05	830	30
FS-3 (4') 10/31/2005	3,400	14.7
FS-4 (4') 10/31/2005	3,400	21.9
FS-20 (4') 10/31/2005	830	30
FS-3A (5') 11/14/2005	310	30.2
FS-4A (5') 11/14/2005	26	37.9
FS-20A (5') 11/14/05	35	35.8
SW-1A (1.5') 11/14/05	7	29
FS-15 (1.5') 11/14/2005	20	36.5
SW-3A (2') 12/23/2005	25	40.4
FS-16A (3.5') 12/23/2005	12	36.5
<b>PHASE IV - Garage/Wetland Area</b>		
G-1 (1') 6/16/2005	130	30.5
G-2 (1') 6/16/2005	41	29.9
G-3 (1.5') 6/16/2005	11,000	7.43
G-4 (1.5') 6/16/2005	19,000	6.62
<b>PHASE V - South of Village Garage</b>		
G-5 (1.50') 8/9/2005	30	34.6
G-6 (1.5') 8/9/2005	95	50.4
G-7 (1.5') 8/9/2005	120	54.8
G-8 (1.0') 8/10/2005	45	64.2
G-9 (1.0') 8/10/2005	400	66.2
G-10 (1.0') 8/10/2005	21	65.9
G-11 (1.5') 8/10/2005	76	63.2
G-12 (1.5') 8/10/2005	150	64.9
G-13 (1.5') 8/10/2005	150	54.7

# DELINEATION/CONFIRMATORY SAMPLE RESULTS

NEXT MEDIA OPERATING, INC.  
114 TOWER ROAD  
GILBERTS, ILLINOIS

JUNE - DECEMBER 2005

Sample ID/Collection Depth/Date	TACO Tier 1 Residential/Industrial/Commercial Soil Remediation Objective (RO's)	
	Ingestion	Inhalation
	400	—
	SAMPLE RESULTS	
	TOTAL LEAD	Moisture Content (%)
<b>PHASE V - South of Village Garage (cont.'d)</b>		
G-14A (1.5') 8/10/2005	<b>570</b>	19.6
SUP-1 (2') 11/17/2005	<b>590</b>	14.8
SUP-2 (2') 11/17/2005	160	21.4
FS-30 (2.5') 11/14/05	81	60.7
FS-31 (2.5') 11/14/05	140	42.9
FS-32 (3') 11/18/2005	13	69.5
FS-33 (2') 11/18/2005	10	78.4
FS-34 (5') 11/18/2005	9.9	64.2
FS-35 (5') 11/18/2005	11	71.7
FS-36 (1') 11/18/2005	<b>450</b>	41.4
FS-37 (1') 11/18/2005	170	41.4
FS-38 (5') 11/18/2005	84	56.2
FS-39 (5') 11/18/2005	<b>490</b>	66.3
FS-40 (3') 11/18/2005	19	68.8
FS-41 (5') 11/21/2005	10	54.3
FS-41 DUP (5') 11/21/2005	14	55.8
FS-42 (5') 11/21/2005	11	50.6
FS-43 (2') 11/21/2005	11	66.4
FS-44 (4') 11/21/2005	10	31.2
FS-39A (6') 12/22/2005	11	47.9

## NOTES:

1. All values are expressed in mg/kg
  2. A bold and shaded value indicates a concentration exceeding TACO Tier 1 Soil RO's
  3. Remediation objectives obtained from Illinois Tiered Approach to Corrective Objectives (TACO); Appendix B, Tables A and B: Tier 1 Soil Remediation Objectives for Residential and Industrial /Commercial Properties (July 2004)
  4. Sample depths indicated are based upon depth at time of previous site conditions: existing grade
- J = Estimated concentration because quality control criteria were not met



Photo 1 – General view of impacted area located southwest of Village of Gilberts Public Works garage (facing north).



Photo 2 – General view of impacted area located southwest of Village of Gilberts Public Works garage (facing north).



Photo 3 – View of gravel access road and excavation located within southwest area (facing south).



Photo 4 – View of excavation located within southwest area (facing south).

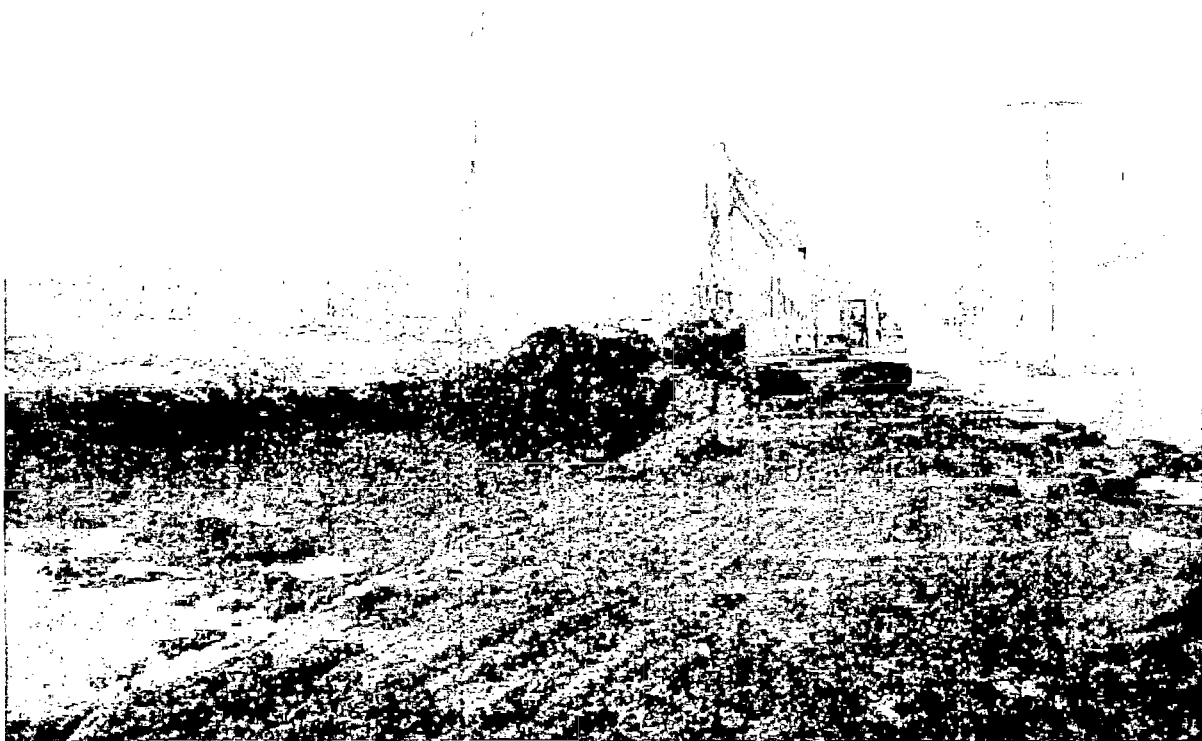


Photo 5 – View of gravel access road and excavation located within southwest area (facing north).



Photo 6 – View of gravel access road and excavation located within southwest area (facing north).